

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Oral Argument Requested

**NOTICE OF WHOLESALER DEFENDANTS' RULE 53 OBJECTION TO
AND MOTION FOR CLARIFICATION OF SPECIAL MASTER ORDER
NO. 64**

PLEASE TAKE NOTICE that on June 6, 2022, or as soon thereafter as counsel may be heard, the undersigned Defense counsel, on behalf of Wholesaler Defendants named below, shall move for entry of an Order clarifying Special Master Order No. 64; and

PLEASE TAKE FURTHER NOTICE that in support of their motion, the undersigned Defendants shall rely upon the Memorandum of Law in Support submitted herewith, and any reply submissions made hereafter; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: May 5, 2022

Respectfully submitted:

/s/ Jeffrey D. Geoppinger
Jeffrey D. Geoppinger
Liaison Counsel for Wholesalers
ULMER & BERNE LLP
312 Walnut Street, Suite 1400
Cincinnati, OH 45202-2409
Tel.: (513) 698-5038
Fax: (513) 698-5039
Email: jgeoppinger@ulmer.com

*Counsel for AmerisourceBergen
Corporation*

Andrew D. Kaplan
Daniel T. Campbell
Marie S. Dennis
Emily G. Tucker
Luke J. Bresnahan
CROWELL & MORING
1001 Pennsylvania Avenue NW
Washington, D.C. 20004
Tel.: (202) 624-1000
Fax: (202) 628-5116
Email: akaplan@crowell.com
Email: dcampbell@crowell.com
Email: mdennis@crowell.com
Email: etucker@crowell.com
Email: lbresnahan@crowell.com

Counsel for Cardinal Health, Inc.

D'Lesli M. Davis
Ellie K. Norris
NORTON ROSE FULBRIGHT US
LLP
2200 Ross Avenue, Suite 3600
Dallas, TX 75201-7932
Tel: (214) 855-8221
Fax: (214) 855-8200
Email:
dlesli.davis@nortonrosefulbright.com
Email:
ellie.norris@nortonrosefulbright.com

Counsel for McKesson Corporation

CERTIFICATE OF SERVICE

I, hereby certify that on May 5, 2022, a copy of the foregoing document was served on all counsel of record via CM/ECF.

By: /s/ Jeffrey D. Geoppinger

Jeffrey D. Geoppinger

Liaison Counsel for Wholesaler Defendants